

FACT SHEET

DRAFT HAZARDOUS WASTE MANAGEMENT PERMIT FOR SITE-WIDE CORRECTIVE ACTION

June 16, 2017

<u>Facility Name</u>	Polynt Composites USA, Inc.
<u>EPA Facility ID Number</u>	VAD055046049
<u>Address</u>	920 Tightsqueeze Industrial Road Chatham, Virginia 24531
<u>Owner/Operator</u>	Polynt Composites USA, Inc. 920 Tightsqueeze Industrial Road Chatham, Virginia 24531
<u>Type of Permit</u>	Hazardous Waste Management Permit for Corrective Action

Purpose of Fact Sheet

This fact sheet is prepared in accordance with the requirements of the Virginia Hazardous Waste Management Regulations (VHWMR), 9 VAC 20-60-124, as incorporated by reference under 40 CFR § 124.8. This fact sheet provides information on: the current status of the facility, the facility background, the facility's current corrective action activities, and the public comment period associated with the draft Permit for Corrective Action. This Permit incorporates a summary of corrective action activities for the identified solid waste management units (SWMUs) or areas of concern (AOCs).

Introduction - Facility Background

The Polynt Composites USA, Inc. facility is located in Chatham, Pittsylvania County, Virginia, approximately 1,200 ft. south of the Banister River. The approximate 101-acre facility is located at the end of Tightsqueeze Industrial Road on the right, within the Tight Squeeze Industrial Park. The Facility was previously owned and operated by Cook Composite and Polymers Co. (CCP) from 1990 to 2014. Polynt took ownership of the facility in 2014 for the production of unsaturated polyester resins for use in the manufacture of fiberglass boats, bathroom fixtures, sinks, and related specialty composite products.

CCP (currently Polynt Composites) was issued a Hazardous Waste Management Permit (Permit) by the Department of Environmental Quality (DEQ) on July 8, 1996 for the storage and treatment of hazardous waste. The Permit was modified on September 19, 2003 to incorporate RCRA Corrective Action requirements and encompassed thirty three (33) solid waste

management units (SWMUs) and nine (9) areas of concern (AOCs) identified during a RCRA Facility Assessment (RFA) conducted in 1988. The original permit issued in 1996 was renewed in 2006 and then modified in 2011. This modification incorporated DEQs proposed decision on the selected action into the permit. This modification incorporated DEQs proposed decision of the corrective action remedy selected into the permit.

Corrective Action Program Activities

Soil Excavation and Consolidation

Constituents of concern (COCs) identified during investigations included acetone, benzene, ethylbenzene, methyl ethyl ketone (MEK), methyl isobutyl ketone (MIBK), methylene chloride, styrene, toluene, xylenes, naphthalene, acetophenone, and manganese. These constituents were found in the soil at different areas of the facility. The contaminated soil from various locations at the facility was excavated and brought to a single location on site for management.

The soil that was determined to remain on site was compacted and graded in preparation of the placement of a concrete cap and drainage system, in accordance with approved plans and specifications under the State Water Control Board (SWCB) Order. The Facility maintains the integrity of this cap and continues to monitor the groundwater underlying the cap. The maintenance of the concrete cap and the continued operation of the pump and treat system are part of the facility's remedy for RCRA Corrective Action.

Active Remedial Measures – Sample Areas and Site-Wide Groundwater

During the construction of the capped soil landfill, a shallow groundwater pump and treat system (treatment system) was installed. The treatment system began operation in 1982 and currently includes four active groundwater recovery wells and an effluent treatment system having two granular activated carbon filters and a non-contact cooling system. The treatment system and its recovery wells have been monitored via groundwater sample analysis since 1982.

The pump and treat system remains in operation as a source of non-contact cooling water and is part of the facility's remedy for RCRA Corrective Action. Operation of the groundwater pump and treat containment system will continue until remedial clean up targets for groundwater are met.

In Situ Chemical Oxidation (ISCO) at Sample Area 5

Sample Area 5 was identified for active remedial measures to treat acetone, benzene, ethylbenzene, and xylenes in soil and groundwater including manganese in groundwater.

In 2008, a pilot test study was conducted from June to September 2008 at SA-5 in support of a Corrective Measures Study (CMS). The pilot test study purposes that the construction of an ISCO remediation system would determine the effectiveness of the remediation.

The system utilizes three injection well nests to inject the oxidant mixture into the subsurface. The system was originally designed to be scaled up in size to treat the sample area and site-wide groundwater. Following the pilot test, system expansion was determined to be unnecessary based on the results of the pilot test study.

In 2015 the facility received DEQ approval to temporarily shut down the ISCO system to

evaluate the results of COCs in groundwater. The 2016 Annual Groundwater Report indicated an increase in the COC concentrations. The facility requested and received DEQ approval to restart the system.

Institutional and Engineering Controls

Institutional and engineering controls are implemented to maintain the current and future integrity of the remedy. Given the nature and extent of impacted media left in place, more than one institutional control is necessary to prevent activities which could interfere with the integrity or protectiveness of the remedy.

Institutional controls to be utilized at the site to protect the public and the environment will;

- Notify prospective buyers of the property of the environmental conditions at the Facility and of DEQ's selected corrective measures as part of the remedy for the Facility under RCRA Corrective Action;
- Prohibit use of the property for residential purposes (including single family homes, multiple family dwellings, schools, day care facilities, child care centers, apartment buildings, dormitories, other residential style facilities, hospitals, and in-patient health care facilities);
- Prohibit the use of groundwater beneath the property;
- Require inspection and maintenance of the concrete cap;
- Require vapor barriers be utilized in or beneath new, totally enclosed structures designed for occupation within identified areas of the facility, unless it's demonstrated to DEQ that it's not necessary to protect human health.
- Restrict subsurface soil excavation below four feet except in conformance with an appropriate soil management plan; and
- Restrict activities that would interfere with or adversely impact the integrity of the remedy

Institutional controls described above will be implemented at the site through the following mechanisms;

- A declaration of restrictive covenant or similar instrument consistent with applicable requirements under the laws of the Commonwealth of Virginia will be recorded with the real property records for the Site such that prospective purchasers of the Site will have constructive notice of land use restrictions. The declaration of restrictive covenants will contain the land use controls described above and will be recorded with the land records in the office of the clerk of the circuit court for the jurisdiction in which the Site is located within ninety (90) days of executing the declaration. The current owner and future owners of the Site will be obligated to comply with the recorded restrictive covenant since the covenant will run with the land;
- The existing Hazardous Waste Management Permit for Site-Wide Corrective Action will be used as the controlling authority for implementation of the RCRA Corrective Action remedy through the DEQ. The Permit was modified, as appropriate, to include land use restrictions as described above; and

- While groundwater beneath the site is not currently used as a drinking water source and there are no plans for such future use, to provide additional protection, the proposed remedy includes institutional controls to prohibit the development of wells for drinking water or other domestic uses at the Facility. A notification to prohibit well drilling under Virginia's Private Well Regulations, 12VAC 5-630-380 was provided to the local health district (Pittsylvania County) in writing describing the nature and extent, including a map, of the contaminated groundwater located on the Facility property. The notice will be updated every three (3) years to reflect the latest contaminated groundwater plume boundary. A copy of the notification will be provided to DEQ.

Purpose of the Permitting Process

One objective of the permitting process is to provide the DEQ, interested citizens, and other governmental agencies the opportunity to evaluate the proposed draft permit and the ability of the Permittee to comply with the applicable hazardous waste management requirements of the Permit and the VHWMR. The draft permit sets forth in one document all the requirements which the Permittee must comply with during the ten (10) year duration of the permit. These requirements include, but are not limited to, the regulations as set forth in the VHWMR.

Draft Permit

The draft permit is based on the permit application submitted on October 28, 2016. The DEQ has reviewed the permit application, and has found the Part A and B permit application submittals to be technically adequate and complete to comply with the requirements of the VHWMR.

Therefore, pursuant to the VHWMR, under 9 VAC 20-60-124, and as adopted by reference, 40 CFR § 124.6, the VDEQ has prepared a draft permit for renewal.

The draft permit is divided into two main parts, Modules I and II and a list of permit attachments that are incorporated into the permit. The two main parts of the permit are outlined below. The column entitled "Regulation," identifies the regulatory authority for the permit conditions in Modules I and II of the Permit. The VHWMR, 9 VAC 20-60, has incorporated by reference, the federal regulations under the Resource Conservation and Recovery Act (RCRA).

Permit Organization

<u>Module</u>	<u>Topic</u>	<u>Regulation</u>	<u>Description</u>
Module I	Standard Conditions	40 CFR § 270.30 40 CFR § 270.32	Contains conditions which generally apply to all hazardous waste management facilities
Module II	Site-Wide Corrective Action	40 CFR § 264.101 40 CFR § 270.14	Outlines the corrective action procedures required by 40 CFR § 264.101.

List of Permit Attachments

The List of Permit Attachments provides detailed information associated with the facility's corrective action. The attachments consist of waste characteristics to assure that sufficient information is available and that appropriate procedures are in place for the proper handling and treatment of wastes at the facility to avoid or minimize hazards to human health and the environment.

The DEQ and EPA Region III have evaluated the need for investigations and/or cleanup of past releases at the Polynt Composites Inc. site in Chatham, VA. This evaluation is a routine part of all permits issued since 1984.

Upon approval of the draft permit, the attachments will be considered enforceable conditions of this permit. The following permit attachments are incorporated into the proposed draft permit by reference.

Attachment A	Facility Location Maps and Figures
Attachment B	Facility Background, Environmental History, SWMU's, and AOC's
Attachment C	Remedial Cleanup COC Concentration Target Levels

Financial Assurance

Financial assurance is required to assure the facility has adequate funding to implement approved corrective action remedy(s) at the facility. The financial assurance is based upon the CA cost estimate procedures identified in Module II of the draft permit. The cost estimate for completing the approved remedy(s) shall be updated pursuant to the development of more detailed information (e.g., Corrective Measure Design or Implementation) and any modifications to the approved remedy(s).

Within thirty (30) calendar days of approval of any revised cost estimate, the Permittee shall demonstrate to DEQ financial assurance for the updated cost estimates.

Public Notice of Proposed Permit Actions

The purpose of public notice of a proposed permit action is to provide the DEQ, interested citizens, other governmental agencies, etc., the opportunity to evaluate and comment upon the draft permit action proposed for the subject facility. Permits are drafted to help assure facility compliance with the final RCRA Permit and the applicable requirements of the Hazardous Waste Management Regulations (VHWMR), 9 VAC 20-60.

Comment Period

Begins: June 21, 2017

Ends: August 7, 2017

The public and the Permittee have forty-five (45) days to review and comment on the draft permit action proposed for the facility.

All persons who believe any condition of a draft permit or proposed permit action is inappropriate, shall raise all reasonably ascertainable issues and submit all reasonably available arguments and factual grounds supporting their position by August 7, 2017. Comments should include sufficient supporting material, including any pertinent technical or legal references and

citations believed appropriate. All comments and supporting rationale for such comments must be provided in writing to:

K. Allyson Lackey, Hazardous Waste Permit Writer
Department of Environmental Quality
Office of Financial Responsibility and Waste Programs
P.O. Box 1105
Richmond, VA 23218
Phone: (804) 698-4421
Fax: (804) 698-4234
E-mail: Kari.lackey@deq.virginia.gov

The DEQ will also accept comments from the public by e-mail. All comments received must provide your name, mailing address, phone number, and also must be received before the end of the comment period.

Public Hearing

The public may request a public hearing. To request a public hearing, the request must be in writing; must state the nature of the issues proposed to be raised in the hearing; and must be made within the public comment period.

Public Information

The public may review the Draft Hazardous Waste Corrective Action Permit, the application, and this fact sheet at the following locations:

DEQ Blue Ridge Regional Office

Contact: Beth Lohman
3019 Peters Creek Road
Roanoke, VA 24019
Phone: (540) 562-6700
* Every work day by appointment

VA DEQ Office of Financial Responsibility and Waste Programs

Contact: K. Allyson Lackey
629 East Main Street
Richmond, VA 23219
Phone: (804) 698-4421
* Every work day by appointment

Pittsylvania County Public Library

24 Military Drive
Chatham, VA. 24531
(434) 432-3271
* During normal hours of operation

- Regular Hours
- Mon – Thu 9:00 am - 8:00 pm

- Fri 9:00 am - 5:00 pm
- Sat 10:00 am - 2:00 pm
- Sun Closed

Procedures for Reaching a Final Permit Decision

When making a final decision regarding this proposed permit action, the DEQ will consider all written comments received during the 45 day public comment period, and oral and written comments received during the public hearing (if applicable), along with the requirements of the VHWMR.

When the DEQ makes a final decision to either issue or deny the permit, final notice will be given to the applicant and each person who has submitted comments or requested notice of the final decision. The final notice will include a written response from the DEQ to each comment submitted and will indicate any changes in the draft permit action which may have been made in response to the comments. The proposed permit action will become effective 30 days after the final permit decision notice unless a change to the draft permit is requested pursuant to the VHWMR, 9 VAC 20-60-80, and the Virginia Administrative Process Act, § 2.2 4000, et seq., of the Code of Virginia and the Virginia Waste Management Board Public Participation Guidelines, 9 VAC 20-10. If no comments request a change in the draft permit, the decision shall become effective immediately upon issuance.